

1 **O'CONNOR BERMAN DOTTS & BANES**  
2 **Second Floor, Nauru Building**  
3 **1 Nauru Loop**  
4 **Susupe, Saipan, CNMI**  
5 **Mail: PO Box 50-1969 Saipan MP 96950**  
6 **Phone: 234-5684**  
7 **Fax: 234-5683**

8 **Attorneys for Plaintiff**

9 **IN THE DISTRICT COURT**  
10 **FOR THE NORTHERN MARIANA ISLANDS**

11 **QIAN XIAOLI,**

12 **Plaintiff,**

13 **vs.**

14 **GRACE INTERNATIONAL, INC.,**

15 **Defendant.**

16 **Civ. No. 07-0017**

17 **MOTION FOR**  
18 **DEFAULT JUDGMENT**

19 WHEREAS Defendant Grace International, Inc., has defaulted in this matter, and its default  
20 was duly entered by the Clerk of Court on October 5, 2007,

21 NOW THEREFORE Plaintiff Qian Xiaoli, through undersigned counsel and pursuant to Rule  
22 55(b)(2) of the Federal Rules of Civil Procedure, hereby applies to the Court for entry of judgment  
23 by default in favor of her and against Defendant, and an award of damages in an amount to be  
24 determined by the Court upon testimony and evidence to be presented at the hearing of this motion.

25 Respectfully submitted this 2<sup>nd</sup> day of November, 2007.

26 **O'CONNOR BERMAN DOTTS & BANES**  
27 **Attorneys for Plaintiff**

28 By: 

Joseph E. Horey